

# **EXHIBIT 4**

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[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-06663

**NOTICE OF DEPOSITION PURSUANT  
TO FED. R. CIV. P. 30(b)(6) TO META  
PLATFORMS, INC.**

Date: September 30, 2024  
Time: 9:00 a.m., local time  
Location: 601 California St Suite 1505, San  
Francisco, CA 94108

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that, in accordance with Rule 30(b)(6) of the Federal Rules of Civil Procedure, Meta Platforms, Inc. (“Meta”) is hereby directed to designate one or more officers, directors, managing agents, or other persons who consent to testify and are most knowledgeable and competent to testify regarding the following topics and related or supporting facts occurring between January 1, 2016 and the present (the “Relevant Period”):

1. Meta’s curation of datasets to train its Large Language Models;
2. Meta’s dataset ablation experiments;
3. Meta’s copying of the datasets commonly known as “Books3”, “The Pile”, and [REDACTED] the individuals who made these copies, the content of these datasets, and Meta’s communications with the creators of “Books3” and “The Pile”;
4. The specific Meta LLMs trained on datasets that included material sourced from “Books3”, “The Pile” [REDACTED];
5. Meta’s gathering of works, including copyrighted works, from public websites for use as training data, including [REDACTED];
6. Meta’s knowledge that its LLM datasets included copyrighted material;
7. Reproductions and storage of these datasets;
8. All internal policies, including approval policies, relating to these datasets;
9. Whether Meta still uses these datasets for LLM training purposes, and if not, why it no longer uses these datasets;
10. The contents of the datasets Meta has produced in this case, labeled Meta\_Kadrey\_Data\_001, Meta\_Kadrey\_Data\_002, Meta\_Kadrey\_Data\_003, Meta\_Kadrey\_Data\_004, and Meta\_Kadrey\_Data\_005.
11. Meta’s attempts to license textual works from third parties.

The deposition will commence on September 30, 2024, beginning at 9:00 a.m., local time and continuing from day to day thereafter until completed, at the offices of Joseph Saveri Law Firm, LLP, 601 California St. Suite 1505, San Francisco, CA 94108. The deposition will be taken before a notary

public or other officer duly authorized to administer oaths and take testimony and will be recorded by stenographic and videographic means.

Dated: September 16, 2024

By: /s/ Joseph R. Saveri  
Joseph R. Saveri

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**CERTIFICATE OF SERVICE**

I, the undersigned, am employed by the Joseph Saveri Law Firm, LLP. My business address is 601 California Street, Suite 1505, San Francisco, California 94108. I am over the age of eighteen and not a party to this action.

On September 16, 2024, I caused the following documents to be served by email upon the parties listed on the attached Service List:

- **NOTICE OF DEPOSITION PURSUANT TO FED. R. CIV. P. 30(b)(6) TO META PLATFORMS, INC.**

I declare under penalty of perjury that the foregoing is true and correct. Executed September 16, 2024, at San Francisco, California.

By: 

Ruby Ponce

**SERVICE LIST**

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